

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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IN RE: NEW ENGLAND COMPOUNDING  
PHARMACY, INC., PRODUCTS  
LIABILITY LITIGATION

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Master File No.: 1:13-MD-2419-FDS  
MDL Docket No.: 2419  
This document relates to: All Cases

**DEFENDANTS', BARRY J. CADDEN, LISA CONIGLIARO CADDEN, CARLA  
CONIGLIARO, GREGORY CONIGLIARO, DOUGLAS CONIGLIARO AND GLENN  
A. CHIN, JOINDER IN DEFENDANT AMERIDOSE, LLC'S BRIEF IN OPPOSITION  
TO LIBERTY INDUSTRIES, INC.'S MOTION FOR A LOCAL 16.1 CONFERENCE**

On June 25, 2014, Defendant, Liberty Industries, Inc. filed a motion for a Local Rule 16.1 Scheduling Conference. (MDL Dkt. No 1226) Defendant, Ameridose LLC, filed an Opposition to that motion on July 7, 2014. (MDL Dkt. No 1246) The Defendants, Barry J. Cadden, Lisa Conigliaro Cadden, Carla Conigliaro, Gregory Conigliaro, Douglas Conigliaro and Glenn A. Chin, hereby join in and incorporate by reference Ameridose's Opposition. Specifically, CMO No. 6 remains in place, thereby staying all pleadings and discovery against the so-called affiliated defendants, including the Defendants, Barry J. Cadden, Lisa Conigliaro Cadden, Carla Conigliaro, Gregory Conigliaro, Douglas Conigliaro and Glenn A. Chin, and making Liberty's request premature. Accordingly, and as stated more fully in Ameridose's opposition, the Defendants, Barry J. Cadden, Lisa Conigliaro Cadden, Carla Conigliaro, Gregory Conigliaro, Douglas Conigliaro and Glenn A. Chin, respectfully request that this Court deny Liberty's Motion for a Local Rule 16.1 Scheduling Conference.

Dated: July 8, 2014

Respectfully submitted,

/s/ Robert H. Gaynor

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Lisa Conigliaro Cadden, Carla Conigliaro, Douglas  
Conigliaro, Gregory Conigliaro and Glenn A. Chin.

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 8, 2014, a true and exact copy of the foregoing was filed with this Panel's CM/ECF filing system, thereby providing electronic notice to those counsel of record listed below who are registered users of the system.

/s/ Robert H. Gaynor

Robert H. Gaynor